

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<i>In re Terrorist Attacks on September 11, 2001</i>	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajbi Bank, et al., Civil Action No. 1:16-cv-07853 (S.D.N.Y.);
Aguilar et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:16-cv-09663 (S.D.N.Y.);
Addesso et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:16-cv-09937 (S.D.N.Y.);
Aiken et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:17-cv-00450 (S.D.N.Y.);
Hodges et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:17-cv-00117 (S.D.N.Y.);
The Charter Oak Fire Insurance Co., et al. v. Al Rajbi Bank, et al., Civil Action No. 1:17-cv-02651 (S.D.N.Y.);
Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., Civil Action No. 17-cv-03908 (S.D.N.Y.);
Abarca, et al. v. Kingdom of Saudi Arabia, et al., Civil Action No. 17-cv-03887 (S.D.N.Y.);
Abedhajajreh, et al. v. Kingdom of Saudi Arabia, et al., Civil Action 17-cv-06123 (S.D.N.Y.).

**NOTICE OF MOTION OF THE NATIONAL COMMERCIAL BANK
TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that, pursuant to Rules 12(b)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, Defendant The National Commercial Bank ("NCB") hereby moves the Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order dismissing all of the claims asserted against NCB for want of personal jurisdiction. A memorandum of law in support of this Motion, and accompanying exhibit, is filed herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to a scheduling order issued by the Honorable Sarah Netburn (MDL Dkt. #3584), any opposing papers shall be filed electronically no later than October 20, 2017.

Dated: August 21, 2017
Washington, D.C.

Respectfully submitted,

/s/ Mitchell R. Berger

Mitchell R. Berger (MB-4112)

Alan T. Dickey (*pro hac vice* admission pending)

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CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of August 2017, I caused a true and correct copy of the Defendant's Notice of Motion to Dismiss for Lack of Personal Jurisdiction to be served through the Court's CM/ECF System on the consolidated MDL docket to all counsel for the parties to the cases consolidated in this MDL, including counsel for all of the parties to the following cases in which The National Commercial Bank is named as a Defendant:

Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., Civil Action No. 1:16-cv-07853 (S.D.N.Y.);

Aguilar et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:16-cv-09663 (S.D.N.Y.);

Addesso et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:16-cv-09937 (S.D.N.Y.);

Aiken et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:17-cv-00450 (S.D.N.Y.);

Hodges et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:17-cv-00117 (S.D.N.Y.);

The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., Civil Action No. 1:17-cv-02651 (S.D.N.Y.);

Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., Civil Action No. 17-cv-03908 (S.D.N.Y.);

Abarca, et al. v. Kingdom of Saudi Arabia, et al., Civil Action No. 17-cv-03887 (S.D.N.Y.);

Abedhajahreh, et al. v. Kingdom of Saudi Arabia, et al., Civil Action 17-cv-06123 (S.D.N.Y.).

/s/ Mitchell R. Berger
Mitchell R. Berger